AUTHOR INDEX

[References are to pages in Volume 43]

B

Billings, Anthony
Finalized Regulations on Natural Resource Recapture Property 615
Brown, Thomas Clayton
Caveat Trustee: Trust Management of Oil and Gas Assets 583
Bryan, Barry J.
The Relationship of Audit Opinions to Auditor Changes in the Oil and Gas Industry 105

C

Calkins, Carol M.
Caught in the Taxable Moment: State and Local Taxation of Petroleum Products in Storage or Transit 427
Campbell, Luther L.
Recent Cases and Rulings 361
Carter, C.P.
Changes in Accounting for Income Taxes: Impact of FASB Statement No. 109 on Oil & Gas Companies 319
Coker, Dianna Ross
Even Publicly Held Corporations Must Worry About the Accumulated Earnings Tax: Planning to Avoid It 45
Tax Court Rejects Both IRS Percentage Depletion Distinctions Without Differences and Primary Purpose Test for IDC 437
Crain, John L.
Section 29 Tax Credit Royalty Trusts: A Win-Win Proposition for Investors and Oil and Gas Companies 295
Craven, Karen
Transfer Pricing and the "Aramco Advantage" Cases 199
Crumbley, D. Larry
Even Publicly Held Corporations Must Worry About the Accumulated Earnings Tax: Planning to Avoid It 45
Working Capital Needs and the Bardahl Formula 173
Finalized Regulations on Natural Resource Recapture Property 615
Crump, James G.
Recent Cases and Rulings 123
Recent Cases and Rulings 361
Recent Cases and Rulings 563
Recent Cases, Regulations and Rulings . . 745

E

Essay, William J.
Caught in the Taxable Moment: State and Local Taxation of Petroleum Products in Storage or Transit 427
Elting, James M.
Working Capital Needs and the Bardahl Formula 173

F

Fambrough, Judon
Mineral Cotenants: Rights & Responsibilities 33
Conflicting Surface and Mineral Rights in Texas 161
Figlewicz, Raymond E.
Acquisition Targets in the Oil and Gas Industry: An Empirical Analysis of Generic Antecedent Conditions 251
Foshee, Andrew W.
Proposed Superfund Policy Changes: Consequences for the Oil, Gas, and Petrochemical Industries 305

G

Gallun, Rebecca A.
SEC Standards in Oil and Gas: Politically Motivated? 81
Garrett, Jeanette
Federal Royalty Valuation Issues in a Post FERC Order 636 Gas Marketing Environment . . . 379
Greenspan, James W.
The Effect of a High Profile Industry on Auditor Independence During the Tender Offer Process 91

H

Hasselback, James R.
Even Publicly Held Corporations Must Worry About the Accumulated Earnings Tax: Planning to Avoid It 45
Hodge, Thomas G.
Use of Explanatory Paragraphs in the Audit Reports of Oil and Gas Companies 333

J

Johnson, Tommi
Do Investors Follow Accounting or Appraised Petroleum Values? 685
Jones, Kris T.
Section 29 Tax Credit Royalty Trusts: A Win-Win Proposition for Investors and Oil and Gas Companies 295

K

Klein, Yehuda L.
Technology Transfer in the Natural Gas Industry: The Case of High Efficiency Furnaces . . . 69
Knoepfle, Terry W.
Protecting Family-Owned Oil and Gas Interest Through Creation of a Family Limited Partnership 15
Koch, James M.
Recent Cases and Rulings 563
Koester, Robert J.
Valuing the Common Stock of Oil and Gas Producing Companies 487

L

Lewis, Tara W.
Recent Cases and Rulings 123
Caught in the Taxable Moment: State and Local Taxation of Petroleum Products in Storage or Transit 427
Recent Cases, Regulations and Rulings . . 745
Lilly, Martha S.
Valuing the Common Stock of Oil and Gas Producing Companies 487
Lynch, Howell
Transfer Pricing and the "Aramco Advantage" Cases 199

M

Malloy, John M.
The IRS Gives its Approval to "Disappearing Wealth" Transfers in Closely Held Business 61
McAllister, Steven K.
Recent Cases, Regulations and Rulings . . 745
McNiel, Douglas W.
Proposed Superfund Policy Changes: Consequences for the Oil, Gas, and Petrochemical Industries 305
Meade, Nancy L.
Takeover Prediction in the Oil and Gas Industry 471
Moak, Allison M.
Taxation of Passive Investment Holding Company Intangibles After *Geoffrey, Inc* 635
Moody, Karl H.
Recent Cases and Rulings 123
Recent Cases and Rulings 563

N

Nichols, Linda M.
SEC Standards in Oil and Gas: Politically Motivated? 81
Needed Tax Incentives for Stripper Wells . . . 629
Nixon, Clair J.
Taxation of Passive Investment Holding Company Intangibles After *Geoffrey, Inc* 635
Relationship Between Methods of Income Reconstruction and Successful Party in Federal Tax Cases 659
Nixon, Mark R.
Relationship Between Methods of Income Reconstruction and Successful Party in Federal Tax Cases 659
Noland, Thomas R.
Examining Alternative Methods of Accounting for Income Taxes: The Effects of the Liability Approach on Companies in the Oil and Gas Industry 525

O

Orbach, Kenneth N.
Continuing Professional Education 141
Continuing Professional Education 373
Continuing Professional Education 575
Continuing Professional Education 763

P

Paxson, Dean A.
Do Investors Follow Accounting or Appraised Petroleum Values? 685
Pope, Cynthia Dahl
Recent Changes to the Treatment of Partnership Retirement Payments: Implications for Oil and Gas Partnerships 217
Pourjalali, Hamid
Effect of the Tax Reform Act of 1986 on the Choices of Accounting Accruals for Oil and Gas Companies 729
Proctor, Thomas Y.
The IRS Gives Its Approval to "Disappearing Wealth" Transfers in Closely Held Business 61

R

Ratliff, Byron
Recent Cases, Regulations and Rulings . . 745
Raven, Ron
Petroleum Trading: Is the IRS About to Shut It Down? 145
Rizzuto, Ronald J.
Do Investors Follow Accounting or Appraised Petroleum Values? 685
Rollins, Joel B.
Federal Royalty Valuation Issues in a Post FERC Order 636 Gas Marketing Environment . . . 379
Rupp, Paul Anthony
Caveat Trustee: Trust Management of Oil and Gas Assets 583
Rushinek, Avi
Net Income-to-Sales Ratio Grouping for the Crude Petroleum and Natural Gas Industry . . 713
Rushinek, Sara F.
Net Income-to-Sales Ratio Grouping for the Crude Petroleum and Natural Gas Industry . . 713

S

Schorr, Gerard J.
Natural Gas Processing Plants, Gasoline Blendstocks, and the Federal Gasoline Tax . . 451
Seago, W. Eugene
Cushion Gas: Depreciable Property, Inventory, or Other Property? 1
Segal, Mark A.
Recent Rulings Suggest a Softening of the Service's Stance on Remediation Expenditures 241
Sena, James A.
Using Local Area Networks in Oil and Gas Firms 343
Shani, Abraham B.
Using Local Area Networks in Oil and Gas Firms 343
Smith, L. Murphy
The Relationship of Audit Opinions to Auditor Changes in the Oil and Gas Industry 105
Using Local Area Networks in Oil and Gas Firms 343
Spikes, Pamela A.
Section 29 Tax Credit Royalty Trusts: A Win-Win Proposition for Investors and Oil and Gas Companies 295
Startzman, R.A.
Russian Tax Policies Discourage Oil & Gas Development 463
Strawser, Jerry R.
Examining Alternative Methods of Accounting for Income Taxes: The Effects of the Liability Approach on Companies in the Oil and Gas Industry 525
Szwajkowski, Eugene
Acquisition Targets in the Oil and Gas Industry: An Empirical Analysis of Generic Antecedent Conditions 251

T

Thompson, James H.
Use of Explanatory Paragraphs in the Audit Reports of Oil and Gas Companies 333
Tripplehorn, Christine M.
Recent Cases and Rulings 361
Tunnell, Larry
Recent Changes to the Treatment of Partnership Retirement Payments: Implications for Oil and Gas Partnerships 217

V

Verreault, Kathyrn M.
Changes in Accounting for Income Taxes; Impact of FASB Statement No. 109 on Oil & Gas Companies 319

W

Walter, Richard M.
Takeover Prediction in the Oil and Gas Industry 471
Ward, Dan R.
Auditor Concentration in the Oil and Gas Industry 553
Ward, Suzanne Pinac
Auditor Concentration in the Oil and Gas Industry 553
Wilson, Jr., Thomas E.
Financial Distress and Auditor Changes in the Oil and Gas Industry 115
Auditor Concentration in the Oil and Gas Industry 553
Audit Committee Independence in the Oil and Gas Industry: The Use of "Grey Area" Directors 677

Y

Yongkang, Zhou
China's Onshore Petroleum Industry: Reformed and Opened to the Outside World . . . 655

Z

Zimmerman, Raymond Z.
Recent Changes to the Treatment of Partnership Retirement Payments: Implications for Oil and Gas Partnerships 217

Zoubi, Taiser AlDiab
The Relationship Between Assets Writedowns and Cumulative Abnormal Returns of Full Cost Oil and Gas Firms 505

SUBJECT INDEX

[References are to pages in Volume 43]

A

Accommodation of the Estates
Doctrine 168
Accounting Method
Cushion Gas 11
Accruals
Accounting Methods 730
Effective Tax Rate 734
Tax Reform Act of 1986 730
Accumulated Earnings
Advantages 46
Bardahl formula 53
Credit 47
Tax rate 45
Accumulated Earnings Tax
Avoiding 48
Bardahl Formula 53, 173, 181
Burden of Proof 55, 58
Credit 47, 174
Operating Cycle 53
Personal Holding Company 45
Rate 45
Reasonable needs 47, 49, 57
Redemption 49
Scope of tax 51
Section 534(c) Statement 56
Acquisition Targets
Bankruptcy 257
Compustat 265, 273
Data Management 275
Hypothesis 262, 263
Independent Variable 266
Literature Search 252, 253
Measurement of Reserves 257
Net Present Value 267
Petroleum Explorers 259
Predicted Relationships 271
Results 280
Synergy 260, 261
Air Quality 69
Alternative Minimum Tax
Section 29 Credit 297
Anti-Injunction Act 147, 153
Appraised Values
Book Value 689, 705
Footnotes 687
Full Cost 702, 707
Hotel 686, 708
Investor 685
SFAS No. 69 686
Successful Efforts 702, 707
Supplementary data Vs Accounting Values . . . 686
ASR No. 258 83
Asset Protection
Family Limited Partnership 17
Audit Committee
Grey Area Directors 677
Independence 678
Auditor Changes 105
Audit Report
SAS No. 58 334
Standard 333
Auditors
Audit Committees 677
Concentration 553
Grey Area Directors 677
Independence 678

B

Bank Deposits Method 660, 661
Bankruptcy Trustee 24
Bardahl Formula
Accounts Receivable Cycle 182
Credit Cycle 194
Current Assets 175, 178
Current Liabilities 177
Defined 53, 173, 181
Inflation Factor 192
Inventory Cycle 184
LIFO 187
Peak Operating Cycle 184, 186
Operating Cycle 173, 175, 181
Working Capital 174, 182
Best Method Rule 209
Blendstocks
Bulk Transfers 455
Defined 457
Excise tax 451
Gasoline 451, 457
Natural Gas 451
Position Holder 453
Break-Even Analysis 718, 719

C

Carried Interest
Recapture of IDC 622
Cash Expenditures Method 660, 663
Cash-Out 417

China
China National Petroleum Commission . . 655
Onshore Activities 656
Regulations 657
Taxation 655
Clay 169
Clean Air Act of 1970 69
Coal 169
Commerce Clause 383, 431
Comparable Profit Method 209
Comparable Uncontrolled Price Method . . . 209
COMPUSTAT
Acquisition Targets 265, 273
Cost Plus Method 209
Cotenancy
Delay rental 34, 36, 40
Fiduciary Duty 40
Lease bonus 34, 36, 40
Mineral Estate 35
Mineral Lease 33, 34
Partitioning 39
Responsibilities 33
Rights 33
Surface 34
Covenants
Trusts 596
Cushion Gas
Accounting Methods 11
Defined 1
Depreciable Property 5
FIFO 2, 3
Fixed asset 1
Investment Tax Credit 563
Inventory 1
LIFO 2, 3
Nonrecoverable 3, 4
Recoverable 3, 4

D

Daisy Chain 156, 157
Deferred Tax Asset 323
Delay Rental
Contenancy 34, 36, 40
Demand Charge 402
Deregulation 145
Disappearing Wealth Transfer
Attribution 64
Closely Held Business 61
Minority Interest 62
Discounted Future Cash Flow 507
Disposition
Defined 626
Due Process Clause
State Taxation 635, 640

E

Economic Interest
Aggregation 565
Minerals In Place 566
Net Profit Interest 565
Nonconventional Fuels Credit 138
Enhanced Oil Recovery
Inflation Adjustment 564
Partnership 361, 364
Significant Expansion 564
Encapsulation Costs
Tax Treatment 245
Endangered Species Act **165**
Environmental Costs
Deductible Costs 242, 363
IRS Treatment 241
Nondeductible Costs 243
Removal Costs 244
Environmental Liability
Trustees 608
Essential License
Form 637 . . . . . 145, 150
Trading 145
Excise Tax
Form 637 149
Gasoline 148
Petroleum Products 145
Rate 148
Exploration
Offshore Drilling Platforms 438
Platforms 438
Property Rights 162, 166
Surface Rights 166
Sulphur 438

F

Family Limited Partnership
At-risk 31
Bankruptcy 24
Estate Planning Tool 15, 17
Foreign Trust 26
Gifts 17
Living trust 17
Oil Royalties 16
Real Estate 16
Securities 16, 18
Valuation discounts 20
FASB No 109 321
Federal Energy Regulatory Commission . . . 379
Federal Trade Commission 380, 383

FERC Order 380 . . . . . 390, 391
FERC Order 436 391
FERC Order 500 393
FERC Order 636
History 380, 381, 391
In general 379, 389
Summary 394
Financial Accounting Standards Board
Full Cost 81, 88
Initiative 85
Political 81, 86
SFAS No. 19 82
Successful Efforts 81, 88
Financial Distress Firm 115
Fixed Asset
Cushion gas 1, 13
Fixed Investment Trust
Section 29 Credit 298
Foreign Tax Credit
Creditability 565
Foreign Trust 26
Form 10-K 265
Form 637
Essential License 145, 159
Producer 150
Full Cost
Asset Writedowns 505
Background 81
Ceiling Amount 505
Hypothesis 509
Reserve Recognition Accounting 507
SEC 505
Results 513
Stock Returns 507
Switching From 88
Writedowns 506

G

Gas
Catch-up Adjustment 14
Cushion Gas 1
Gasoline
Deferred 457
Gold 169
Goodwill
Partnership 219, 221
Grey Area Directors
Audit Committee 677
Independence 678

H

Hot Assets
Partnership 240

I

Incident and Necessary Test
IDC 441, 445
Independent Producer
Defined 385
Intangibles
Commerce Clause 644
Due Process Clause 635, 640
State Taxation 637
Intangible Drilling Costs
Carried Interest 622
Defined 616
Deductible 363, 437, 439, 615
Disposal Problem 442
Drilling Work 439
Election 565
Incident Test 446
Like Kind Exchange 621
Nonproductive Wells 137
Partnership 617
Recapture 615, 617, 747
Salvage Value 439
Sulphur 438, 444
Working Interest 444
Interperiod Tax Allocation
Balance Sheet Liability.525
Deferred Method 529
Deferred Taxes 525
FASB 526
In General 322
Liability Approach 527, 530, 546, 552
Permanent Differences 527
Results 537
SFAS 96 537
SFAS 109 . . . . . 537, 539
Temporary Differences 528, 533
Interstate Oil & Gas Compact Commission
Stripper Wells 629
Inventory
Cushicn Gas 1, 2, 6
FIFO 2, 3, 13
LIFO 2, 3, 13
Investment Holding Company
Intangibles 635
Passive 652
State Taxation 635
Investment Tax Credit
Cushion Gas 563
Iron Ore 169

L

Lease Bonus
Cotenancy 34, 36, 40
Lease Forms 163

Lignite 169, 170
Limited Partnership
Trust 584
Load Management Fee 404
Local Area Networks 343
Local Distribution Companies . . . 381, 392

M

Marginal Production 362
Market Hubs 415
Mesa Royalty Trust 299
Microcomputers 343
Mineral Estate
Exploration 162, 166
Lease 161, 381
Negligent 165
Production 162
Rights 161
Subdivision Drill Sites 163
Six Interests 35
Surface Damages 161
Surface rights 161
Mineral Rights
(See Mineral estate)
Minerals
Defined 169
Minerals Management Service . . . 380, 400, 401

N

Natural Gas
Blendstocks 451
Excise Tax 451
In General 70
Plant 458
Products 457
Royalty Valuation 379
Segments 381
Natural Gas Act of 1938 384
Natural Gas Company
Defined 384
Independent Producer 385
Natural Gas Policy Act of 1978 387
Natural Gas Wellhead Decontrol Act of 1989 379
Negligent
Non-negligent 167
Surface Rights 165
Net Income-to-Sales Ratio 718
Net Worth Method 660, 662
Non-negligent Activities 167
Nonproductive Wells
Intangible Drilling Costs 137, 625
Recapture 625

O

Offshore Drilling Platforms
Exploration 438
IDC 438, 439
Offtaker Subsidiaries 200
Oil Pollution Act
Trustee 611
Oil Spill Excise Tax 140
Operating Cycle
Bardahl Formula 53, 173
Defined 173, 181
Operation Sites
Defined 164
Option Payments 745, 749
Order 636
(See FERC Order 636)

O

Overriding Royalty
Trust 585

P

Partitioning 39
Percentage Depletion
Deductible 444
Incident Test 445
In General 124, 134
Limits 448
Representative Market Price 124, 134
Sulphur 444
Unitization Agreement 448
Percentage Method
Reconstruction of income 660, 664
Personal Holding Company
Accumulated Earnings Tax 45
Pipeline Imbalances 416
Pollution Tax 70
Position Holder 156
Professional Trustee
Breach of Duty 578
Close Mine Situation 588
Covenants 596
Duty 605
Environmental Liability 608
In General 583
Management 583
Mismanagement 592
Open Mine Situation 588
Trust 585
Profit Split Method 209

Producer
Definition 150
Production
Property Rights 162

R

Recapture
Disposition 626
IDC 615, 617
Reconstruction of Income
Approaches 659
Bank Deposits Method 661
Cash Expenditures Method 660, 663
IRS Success 671
Net Worth Method 660, 662
Percentage Method 660, 664
Taxpayer Success 671
Variables 665
Remediation Expenditures
Encapsulation Costs 245
Environmental Costs 241
Expansive Approach 241
Removal Costs
Encapsulation Costs 245
IRS Treatment 244
Representative Field Price 124, 134
Representative Market Price 124, 134
Resale Price Method 209
Reserve Recognition Accounting
Discounted Cash Flow 507
In General 507
Residential Pulse 70, 71, 72
Retirement Payments
Capital 224
Depletion 218
Goodwill 219, 221
Limited Partner 217
Material income-producing factor 222
Partnership 217
Retiring Partners 217
Service Partner 220, 235
Substantially Appreciated Inventory 227
Tax Treatment 217, 239
Unrealized Receivable 219, 225
Revenue Reconciliation Act Of 1993 . . 220
Revised Uniform Limited Partnership Act . 17, 23
Royalties
Aramco Advantage 205, 215
Family Limited Partnership 16
Mineral Lease 161
Minerals Management Service 380, 399
Portfolio Income 299
Section 29 Credit 299
Trust 584
Valuation 399
Royalty Trust
Mesa Royalty Trust 299
Risks 301
Section 29 Credit 295, 298
Russia
Discourage 463
Excise Tax 466
Export Tax 467
Gas Production 464
Mineral Replacement Tax 467
Oil Production 464
Profits Tax 468
Road Tax 467
Tax Policies 463

S

Sand 169
SAS No. 58 334
SFAS No. 17 82
SFAS No. 19 87
SFAS No. 69 . . . . . 83, 685
SFAS No. 96 537
SFAS No. 109 537
S Corporation
Built-in Gains 746
Section 29 Credit
Alternative Minimum Tax 297
Fixed Investment Trust 298
In General 125, 295
Mesa Royalty Trust 299
Risks 301
Royalty Trust 295, 298
Specific Royalty Trusts 299
Securities and Exchange Commission . . 81
Seismic Tests 166
Self-Employment Tax 124, 133, 136
Service Partner 220
Sociotechnical Systems 344
ST 155
State Taxation
Commerce Clause 431, 436
Import/Export Clause 429
In Transit 429
Petroleum Products 427
Step-up in Basis
Partnership 229
Stripper Well
Credit 631
Defined 629
IOGCC 629
Subchapter K
Anti-Abuse Rules 747

Electing-out 746
Subdevelopers 163
Substantially Appreciated Inventory
Partnership 227
Substantial NEXUS
State Taxation 635
Successful Efforts
Background 81
Switching to 88
Sulphur
Percentage Depletion 438, 444
Superfund Taxes 305
Surface
Damages 161, 163
Dominates 162
Negligent 165
Owner 163

T

Takeover Prediction
Activity Level 473
Fixed Assets 481
Earnings-to-Price Ratio 477
Market To Book Ratio 481
Size 481
Variables 475, 483, 484
Taxpayer Compliance Measurement Program
Reconstruction of income 659
Tender Offer 91
Auditor 92
Friendly 95
Hostile 95
Terminal Operator 155
Texas Railroad Commission . . 36, 126, 164
Time of Severance 170
Trade Zones
Excise Taxes 362
Trading
Anti-Injunction Act 147
Daisy Chain 156, 157
Deregulation 145
Essential License 145
Excise Tax 147
Form 637 . . . . . 145, 150
Petroleum 145
Position Holder 156
Producer 150
ST 155
Terminal Operator 155
Transfer Pricing
Aramco Advantage 199, 205, 215
Insurance 203
Intercompany Transfers 201
Methods 209
Offtaker Subsidiary 200
Procter and Gamble decision 207
Section 482 . . . . . 202, 204
Tangible Property 209
Trusts
Breach of Duty 585
Caveat 583
Covenants 596
Duty 605
Exculpatory Clause 591
Implied Covenants 594
Management 583
Mismanagement 592
Pay Zone 584
Professional Trustee 585
Prudent Man 585

U

Unbundling 409
Undyed Diesel Fuel
Credit 362
Guidance 362
Uniform Capitalization
Interest 747
Unitization Agreement
Percentage Depletion 448
Sulphur 448
Unrealized Receivables
Partnership 219
Uranium 169

V

Valuation
Adjustments 495
Book Value 487
Equivalent Barrels 490
Example 500
FASB 491, 496
NOGPA 497
Reserves 488, 493
Results 503
SEC 491
Undeveloped Reserves 493
Valuation Allowance 324

W

Wellhead Prices 388
Wetlands Act 165
Working Capital
Bardahl Formula 175, 182
Working Interest
IDC 444

In General 124, 133
Trust 584